

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

Plaintiff,

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,
and IME COMPANIONS LLC,

Defendants.
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Case No.: 1:20-cv-1032 (PKC) (JRC)

**DECLARATION OF
EMANUEL KATAEV, ESQ. IN
SUPPORT OF PLAINTIFF'S
MOTION FOR A TEMPORARY
RESTRAINING ORDER,
PRELIMINARY INJUNCTION, &
PERMANENT INJUNCTION**

Emanuel Kataev, Esq., declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury,
that the following is true and correct:

1. I am admitted to practice before this Court and am an associate of Milman Labuda Law Group PLLC, attorneys for the Plaintiff IME WatchDog, Inc. ("IME WatchDog") in this case.

2. As such, I am familiar with all the facts and circumstances heretofore had herein based upon my personal knowledge and a review of the file maintained by this office.

3. The above-entitled case is brought for the purpose of, *inter alia*, obtaining a temporary restraining order and a preliminary injunction for violations committed by the Defendants.

4. No previous application for the relief herein prayed for has been made in this Court.

5. I certify that there are no frivolous contentions contained in any of Plaintiff's papers submitted.

6. Pursuant to Rule 65 of the Federal Rules of Civil Procedure and 18 U.S.C. § 1836(A), I certify that this *ex parte* application may be brought without notice to Defendants to secure confidential and proprietary trade secret information.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 25, 2022.

/s
Emanuel Kataev, Esq.